

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF TEXAS
FORT WORTH DIVISION**

X CORP.,

Plaintiff,

v.

**MEDIA MATTERS FOR AMERICA,
et al.,**

Defendants.

Civil Action No. 4:23-cv-01175-O

**DEFENDANTS' MOTION TO DISMISS FOR LACK OF PERSONAL JURISDICTION,
IMPROPER VENUE, AND FAILURE TO STATE A CLAIM**

Defendants Media Matters for America and Eric Hananoki (collectively, "Defendants") respectfully move the Court for an order dismissing the above-captioned case for lack of personal jurisdiction, improper venue, and failure to state a claim upon which relief can be granted. For the reasons stated in the accompanying Memorandum of Law in Support of Defendants' Motion to Dismiss, and Appendix thereto, the Complaint should be dismissed entirely and with prejudice pursuant to Federal Rules of Civil Procedure 12(b)(2), 12(b)(3), and 12(b)(6).

WHEREFORE, Defendants respectfully request dismissal of the Complaint.

Respectfully submitted,

/s/ Andrew LeGrand

GIBSON, DUNN & CRUTCHER LLP
Andrew LeGrand (TX 24070132)
2001 Ross Avenue, Suite 2100
Dallas, TX 75201
T: (214) 698-3100
F: (214) 571-2960
alegrand@gibsondunn.com

Theodore J. Boutrous, Jr.** (CA 132099)
333 South Grand Avenue
Los Angeles, CA 90071
T: (213) 229-7000
F: (213) 229-7520
tboutrous@gibsondunn.com

Amer S. Ahmed** (NY 4382040)
200 Park Avenue
New York, New York 10166
T: (212) 351-4000
F: (212) 351-4035
aahmed@gibsondunn.com

Dated: February 6, 2024.

ELIAS LAW GROUP LLP
Abha Khanna* (WA 42612)
1700 Seventh Avenue, Suite 2100
Seattle, WA 98101
T: (206) 656-0177
F: (206) 656-0180
akhanna@elias.law

Jacob D. Shelly* (DC 90010127)
Omeed Alerasool* (DC 90006578)
250 Massachusetts Avenue NW, Suite 400
Washington, DC 20001
T: (202) 968-4490
F: (202) 986-4498
jshelly@elias.law
oalerasool@elias.law

* Admitted *pro hac vice*

** *Pro hac vice* application forthcoming

Counsel for Defendants Media Matters for America and Eric Hananoki

CERTIFICATE OF SERVICE

On February 6, 2024, I electronically submitted the foregoing document with the clerk of court for the U.S. District Court, Northern District of Texas, using the electronic case filing system of the court. I hereby certify that I have served all parties electronically or by another manner authorized by Federal Rule of Civil Procedure 5(b)(2).

/s/ Andrew LeGrand
Andrew LeGrand